

Proposed Objection Deadline: December 6, 2013 at 12:00 p.m. (EST)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In Re:	:	
	:	Chapter 11
DPH HOLDINGS CORP., et al.,	:	
	:	Case No. 05-44481 (RDD)
Reorganized Debtors.	:	
	:	(Jointly Administered)
	:	
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**NOTICE OF UNITED STATES' MOTION TO APPROVE THE JOINT STIPULATION AND
AGREED ORDER, CONSENT DECREE AND SETTLEMENT AGREEMENT**

PLEASE TAKE NOTICE that the United States on behalf of the U.S. Environmental Protection Agency (the "United States") has filed a Motion to Approve the Joint Stipulation and Agreed Order, Consent Decree and Settlement Agreement, (the "Motion"), which was previously filed via Notice of Lodging on November 8, 2013. The United States has moved the Court to shorten the notice period such that any opposition to the Motion must be filed no later than **December 6, 2013 at 12:00 p.m. (EST)**, and has further requested that, absent any filed opposition, the Court grant the Motion without a hearing.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief

requested in the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties in interest, on a 3.5 inch disk, in text-searchable Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (in either case, with a hard-copy delivered directly to Chambers), and shall be served upon: (a) the undersigned counsel to the United States, Preet Bharara, United States Attorney, Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York, 10007; fax (212) 673-2702, Attn: AUSA Cristine Irvin Phillips; (b) all parties listed on the Master Service List; and (c) all those persons and entities that have formally requested notice by filing a written request for notice, pursuant to Bankruptcy Rule 2002 and the Local Bankruptcy Rules. Failure to file a timely response may result in entry of a final order granting the relief requested in the Motion as requested by the United States.

Dated: New York, New York
December 3, 2013

PREET BHARARA
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